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April 5, 2022

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Merchan et al v. MTP Parking Lot et al
1:19-cv-03729-DLI-SMG**

Dear Judge Bloom,

Pursuant to Judge Irizarry's Order dated March 30, 2022, issued subsequent to the status letter filed by the parties on March 29, 2022, both parties hereby request a settlement conference with Your Honor.

Undersigned counsel believes that at trial, Plaintiffs can prove damages in excess of \$2,000,000.00, whereas the most recent settlement offer made by the defendants was \$15,000.00. This is a huge gap and in my experience, it will take a verdict from a jury, for the defendant entities and their principal owner to the understand the magnitude of their actions.

I thank the Court for its consideration toward this matter.

Respectfully submitted,

/s/Peter S. Gordon, Esq
Peter S. Gordon, Esq